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Chamberlain

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH AND  
STEPHEN KEITH CHAMBERLAIN

Defendants.

CASE NO. 3:18-cr-00577-CRB

**Defendant Stephen Chamberlain's  
Unopposed Administrative Motion for  
Leave to Exceed Page Limitations for:**

**(1) Motion to Dismiss Counts One through  
Fifteen and Seventeen of the Superseding  
Indictment, and**

**(2) Motion to Compel the Government to  
Secure the Trial Attendance of Rob Knight  
or, in the Alternative, to Issue a Rule 15  
Order and Letters Rogatory**

Assigned to Hon. Charles R. Breyer

1 Defendant Stephen Chamberlain moves for leave to exceed the fifteen-page limit specified  
 2 in Rule I.C of the Court’s General Standing Order for Civil and Criminal Cases for his memoranda  
 3 of points of authorities in support of two motions he is filing: (1) his Motion to Dismiss Counts  
 4 One through Fifteen and Seventeen of the Superseding Indictment (“Motion to Dismiss”); and (2)  
 5 his Motion to Compel the Government to Secure the Trial Attendance of Rob Knight or, in the  
 6 Alternative, to Issue a Rule 15 Order and Letters Rogatory as to Such Witness (“Motion to  
 7 Compel”).

8 Mr. Chamberlain respectfully requests leave to file a memorandum of points and  
 9 authorities of up to twenty-five pages in support of each motion. The government does not oppose  
 10 this request.

11 The Motion to Dismiss sets forth the factual bases for all sixteen counts at issue and the  
 12 government’s extensive efforts to toll the statutes of limitations for each. It calculates and  
 13 addresses the timeliness of each of the sixteen counts under multiple scenarios involving different  
 14 potential theories of tolling. An additional ten pages will permit Mr. Chamberlain to fully develop  
 15 his arguments for dismissing each count.

16 The Motion to Compel is, in substance, three motions in one: (1) a motion to compel the  
 17 government to secure Mr. Knight’s appearance at trial, (2) in the alternative, a motion for Mr.  
 18 Knight’s deposition pursuant to Rule 15(a), and (3) a request for the issuance of letters rogatory.  
 19 An additional ten pages will permit Mr. Chamberlain to set forth the legal authorities and factual  
 20 support for all three motions and will remove the necessity of filing them separately.

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1 For these reasons, Mr. Chamberlain respectfully requests that the Court enter an order  
2 permitting him to file memoranda of points and authorities of up to twenty-five pages in length in  
3 support of the Motion to Dismiss and the Motion to Compel.

4 DATED: September 29, 2023

Gary S. Lincenberg  
Ray S. Seilie  
Michael C. Landman  
Bird, Marella, Boxer, Wolpert, Nessim,  
Drooks, Lincenberg & Rhow, P.C.

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9 By: /s/ Gary S. Lincenberg  
Gary S. Lincenberg  
10 Attorneys for Defendant Stephen Keith  
Chamberlain  
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3 **UNITED STATES DISTRICT COURT**  
4 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
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6 UNITED STATES OF AMERICA,

7 Plaintiff,

8 vs.

9 MICHAEL RICHARD LYNCH AND  
10 STEPHEN KEITH CHAMBERLAIN

11 Defendants.

CASE NO. 3:18-cr-00577-CRB

**[Proposed] Order**

Assigned to Hon. Charles R. Breyer

12 The Court has reviewed Defendant Stephen Chamberlain's Unopposed Administrative  
13 Motion for Leave to Exceed Page Limitations for (1) Motion to Dismiss Counts One through  
14 Fifteen and Seventeen of the Superseding Indictment, and (2) Motion to Compel the Government  
15 to Secure the Trial Attendance of Rob Knight or, in the Alternative, to Issue a Rule 15 Order and  
16 Letters Rogatory (the "Administrative Motion"). Finding good cause, the Court GRANTS the  
17 Administrative Motion. Mr. Chamberlain is permitted to file memoranda of points and authorities  
18 of up to twenty-five pages in support of (1) his Motion to Dismiss Counts One through Fifteen and  
19 Seventeen of the Superseding Indictment, and (2) his Motion to Compel the Government to Secure  
20 the Trial Attendance of Rob Knight or, in the Alternative, to Issue a Rule 15 Order and Letters  
21 Rogatory.

22 IT IS SO ORDERED.  
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25 DATED: \_\_\_\_\_

26 The Honorable Charles R. Breyer  
27 United States District Judge  
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